

- C. The Corrective Measures Plan has been implemented within 60 days of approval by the Regional Administrator as required in, item C.4.

N/A

Remarks:

In general RMI has submitted the RFI to U.S. EPA on May 1989. The U.S. EPA to date has not consented verbally or in writing to RMI, so they can not proceed to corrective actions yet.

1-7-87 9:00
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-04-0584

GENERAL INFORMATION

U.S. EPA I.D. # OH 0000810242

Facility: BMI-SODIUM Address: STATE RD 4 E. 6TH ST. City: ASHTABULA
State: OHIO Zip Code: 44004 County: ASHTABULA Telephone: 216-997-5141

INSPECTION PARTICIPANT(S)

(Name)	(Title)	(Telephone)
1. <u>JOE HOLMAN</u>	<u>SUPERVISOR-ENVIRONMENTAL CONTROL</u>	<u>216-652-9951</u>
2. <u>BEN DIRIENZO</u>	<u>PLANT MANAGER</u>	<u>216-997-5141</u>
3. <u>BRIAN WRIGHT</u>	<u>MANAGER - SODIUM PRODUCTION</u>	<u>216-997-5141</u>
<u>JIM STEUDLER</u>	<u>SR. ENGINEER-ENVIRONMENTAL CONTROL</u> <u>INSPECTOR(S)</u>	<u>216-544-7802</u>
1. <u>CHRIS FRAZIER</u>	<u>ENVIRONMENTAL SCIENTIST</u>	<u>216-425-9171</u>
2. <u>BILL SKOWRONSKI</u>	<u>SECTION CHIEF</u>	<u>216-425-9171</u>
3. _____	_____	_____

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☐ Generator only (G)
☐ Transporter (T)
☐ TSDF only
☐ G-T
☒ G-TSDF
☐ T-TSDF
☐ G-T-TSDF

☒ General Facility Standards, Preparedness
and Prevention, Contingency and Emergency
Manifests/Records/Reporting, Closure
☐ Containers S01
☐ Tanks S02/T01
☐ Surface Impoundments S04/T02
☒ Incineration/Thermal Treatment

☒ Waste Piles S03
☐ Land Treatment D01
☐ Landfills D00
☐ Chemical/Physical/
Biological 104
☐ Groundwater Monitoring
☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?

Yes No N/A Remark #

✓ — — —

2. If "yes", is it complete and accurate?

✓ — — —

3. Has the facility submitted a Part B?

✓ — — —

4. Was advance notice of the inspection given? If so, how far in advance?

✓ — — 2 DAYS

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

BA, CD & PB CONTAINING CELL BATH WASTE IS STORED
IN THE WASTE PILE.

REACTIVE NA/CA WASTE BURNED IN THE BURN ROOM.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	✓	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	—	—	✓	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	—	—	✓	NO PLACARD NECESSARY
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	—	—	✓	—
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	—	—	✓	—
b) The date that accumulation began is clearly marked on each container.	—	—	✓	—
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	—	✓	—	SCHEDULED FOR JAN. 20, 1987
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>Subpart B: General Facility Standards</u>				
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
IF <u>BOTH</u> 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	SCHEDULED FOR JAN. 20, 1987
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] — ✓ — —
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system. ✓ — — —
 - b) Access to telephone, radio or other device for summoning emergency assistance. ✓ — — —
 - c) Portable fire control equipment. ✓ — — —
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. ✓ — — —
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] ✓ — — —
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] ✓ — — —
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] ✓ — — —
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] ✓ — — —
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] — — ✓ —

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident.
 - b) Arrangements or agreements with local or state emergency authorities.
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
 - d) A list of all emergency equipment including location, physical description and outline of capabilities.
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)]

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

PLAN
RECENTLY
REVISED

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- | | | | | |
|--|---|---|---|--|
| 1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information: | | | | <p align="center">OPERATING
RECORD FULLY
MAINTAINED
FOR BURN
ROOM BUT
DISCONTINUED
FOR THE WASTE
PILE IN JULY, '86</p> |
| a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)] | — | ✓ | — | |
| b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s). | — | ✓ | — | |
| c) The estimated (or actual) weight, volume or density of the waste material(s). | — | ✓ | — | |
| d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980). | — | ✓ | — | |
| e) The present physical location of each hazardous waste within the facility. | — | ✓ | — | |
| f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)] | — | — | ✓ | |
| g) Records of any waste analyses and trial tests required to be performed. | ✓ | — | — | |
| h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B). | ✓ | — | — | |
| i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)] | — | — | ✓ | |
| j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G. | ✓ | — | — | |

RCRA INTERIM STATUS INSPECTION FORM

- | | Yes | No | N/A | Remark # |
|---|-------------------------------------|--------------------------|--------------------------|----------------------------|
| 2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | SUBMITTED
APRIL 7, 1986 |

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--|
| 3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- | | | | | |
|---|---|---|---|---|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12] | ✓ | — | — | — |
| a) A description of how and when the facility will be closed.
(265.112(a)(1)) [3745-66-12(A)(1)] | ✓ | — | — | — |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | ✓ | — | — | — |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.) | ✓ | — | — | — |
| d) A description of steps taken to decontaminate facility equipment. | ✓ | — | — | — |
| e) The year closure is expected to begin and a schedule for the various phases of closure. | ✓ | — | — | — |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)] | ✓ | — | — | — |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)] | — | — | ✓ | — |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark.#

Subpart II: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]

a) A closure trust fund, or

b) A surety bond, or

c) A closure letter of credit, or

d) A combination of financial mechanisms.

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

3. When was the most recent estimate made?

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

5. When was the most recent estimate made?

—	—	—	—
—	—	—	—
—	—	—	—
✓	—	—	—
✓	—	—	\$2,700,000
✓	—	—	AUG, 1986
—	—	✓	—
—	—	✓	—

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart L: Storage in Waste Piles

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal. (265.251) [3745-67-51]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. If leachate or runoff from a Waste Pile is a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation: (265.253) [N/A]				
a) The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. (265.252) [3745-67-52]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
4. Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met: (265.256) [3745-67-56]				
a) The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of Section 265.17(b). [3745-65-17]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____

RCRA INTERIM STATUS INSPECTION FORM

5. Incompatible materials, ignitable and reactive wastes are placed in the waste pile only in accordance with the safety requirements of Section 265.17(b) [3745-65-17]. (265.256 and 265.257(a)) [3745-67-56 and 3745-67-57(A)]
6. A waste stored in a pile and which is incompatible with materials stored nearby is separated or protected from them. (265.257(b)) [3745-67-57(B)]

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
—	—	✓	—
✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. 040000810242

Facility: RMI - SODIUM PLT. FACILITY Address: STATE RD. 4 EAST 16TH ST. City: ASHTABULA
State: OHIO Zip Code: 44004 County: ASHTABULA Telephone: (216) 997-5141
Facility Operator: RMI CO. CONTACT: JOE HOLMAN Title: ENVIRONMENTAL ENG. Telephone: (216) 652-9951
Facility Owner: SAME MAILING Address: PO BOX 269 1000 WARREN AVE
MAILING City: NILES State: OHIO Zip Code: 44446 Telephone: _____
Type of Ownership: X Private _____ Government State HWFAB No. 02-04-0584
Date of Inspection: 5/28/82 Time of Inspection: (Start) 9:15 (Finish) 11:30
Advance Notification? _____ No X Yes: _____
Weather Conditions: DAMP, SUNNY (RAINED DURING EARLY MORNING)

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Mr. Throck</u>	<u>Plant Mgr.</u>	<u>(216) 997-5141</u>
2.	<u>Joe Holman</u>	<u>Environmental Eng.</u>	<u>(216) 652-9951</u>
3.	<u>Bob. Carr</u>	<u>Sup. - Safety & Security</u>	<u>(216) 997-5141</u>
4.	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	Chris Fazio	Environmental Scientist II	(214) 425-9171
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☐ Storage C. ☒ Treatment
D. ☐ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: _____

b) Non-Listed Wastes: ☐ I ☐ C ☒ R ☐ T
D001 D002 D003 D000

D003 - SODIUM/CALCIUM RESIDUE

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

☐ Yes, See Remark # ☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) X No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

REMARKS, PART 1. (GENERAL INFORMATION)

Facility generates both a barium-containing sludge and a reactive sodium/calcium residue. The barium sludge is stored on-site for <90 days before disposal at Mill Services, Pa. The sodium/calcium residue is also stored for a short time on-site before being treated (open burned). The burning takes place in two locations - in a "burning room" inside the plant and on a "concrete pad" outside the plant. The containers which are "treated" on the concrete pad are too large to "treat" in the burning room.

Facility has effective open burning permit from OEPA-DAPC.
Annual report indicates that twice as much waste has been burned than
the Part A "Estimated Quantity of Hazardous Waste." (pg 3 of 5) lists. According to
RMI.

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PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<u>X</u>	<u>—</u>	<u>—</u>	BARIUM SLUDGE SODIUM/CALCIUM RESIDUE
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<u>—</u>	<u>X</u>	<u>—</u>	<u>—</u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<u>—</u>	<u>X</u>	<u>—</u>	<u>—</u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	—	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	—	—	X	CONTAINER IS >110 GALLONS (ROLL-OFF)
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	—	—	X	"
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	X	—	—	—
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	X	—	—	—
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	—	—	X	—
8. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:	X	—	—	—
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	X	—	—	Tarped

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	<u>X</u>	—	—	—
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<u>X</u>	—	—	—
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	<u>X</u>	—	—	—
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	—	—	<u>X</u>	—
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	<u>X</u>	—
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	—	—	<u>X</u>	—
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	—	—	<u>X</u>	—
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	<u>X</u>	—	—	—
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	<u>X</u>	—	—	—

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11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

Yes No N/A Remark #

— — X —

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	—	—	—	—
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	—	—	—	—
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	—	—	—	—
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	—	—	—	—
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	—	—	—	—
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	—	—	—	—
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	—	—	—	—
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	—	—	—	—
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	_____	_____	_____	_____
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	_____	_____	_____	_____
9. Does the transporter store hazardous wastes temporarily while they are in transit?	_____	_____	_____	_____
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	_____	_____	_____	_____

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	_____	_____	_____	_____
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards	E: Manifest/Records/Reporting	H: Financial Requirements
C: Preparedness and Prevention	F: Ground Water Monitoring	
D: Contingency and Emergency	G: Closure	

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<u>X</u>	—	—	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	—	—	<u>X</u>	COMPANY FEELS PROCESS WILL NEVER CHANGE THERE FOR THE PLAN IS UNNECESSARY
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<u>X</u>	—	—	
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<u>X</u>	—	—	
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<u>X</u>	—	—	
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<u>X</u>	—	—	

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	<u>X</u>	—	—	—
a) Inspect emergency equipment.	<u>X</u>	—	—	—
b) Inspect monitoring equipment.	—	—	<u>X</u>	—
c) Inspect security, alarm and communications devices.	<u>X</u>	—	—	—
d) Inspect process equipment (pipes, pumps, etc.).	—	—	<u>X</u>	—
e) Inspect containment structures (dikes, curbs, etc.).	—	—	<u>X</u>	—
f) Inspect facility for structural malfunctions (roof, floor, etc.).	—	—	<u>X</u>	—
g) Inspect hazardous waste handling/loading areas each day used.	<u>X</u>	—	—	—
h) Record of any malfunctions due to equipment or operator errors.	<u>X</u>	—	—	—
i) Record of any hazardous waste discharges.	<u>X</u>	—	—	—
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<u>X</u>	—	—	—
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<u>X</u>	—	—	—
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<u>X</u>	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<u>X</u>	—	—	—
b) Physical separation of incompatible waste materials.	—	—	<u>X</u>	—
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	—	<u>X</u>	—	—
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	—	—	<u>X</u>	—

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	—	<u>X</u>	—	—
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<u>X</u>	—	—	—
a) Internal alarm system	<u>X</u>	—	—	—
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>X</u>	—	—	—
c) Portable fire control equipment.	<u>X</u>	—	—	—
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	—	—	<u>X</u>	—
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<u>X</u>	—	—	—
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<u>X</u>	—	—	<u>paging system</u>

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<u>X</u>	<u>—</u>	<u>X</u>	<u>—</u>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
a) Actions to be taken by personnel in the event of an emergency incident.	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
b) Arrangements or agreements with local or state emergency authorities.	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u>X</u>	<u>—</u>	<u>—</u>	<u>KEPT AT GUARD HOUSE</u>
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<u>X</u>	<u>—</u>	<u>—</u>	<u>IN DISASTER PLAN</u>
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<u>X</u>	—	—	—
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<u>X</u>	—	—	—
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	—	—	<u>X</u>	—

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<u>X</u>	—	—	—
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	<u>X</u>	—	—	—
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<u>X</u>	—	—	—
c) The estimated (or actual) weight, volume or density of the waste material(s).	<u>X</u>	—	—	—
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	—	<u>X</u>	—	—

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	—	—	X	—
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	—	—	—	—
g) Records of any waste analyses and trial tests required to be performed.	—	—	—	—
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	—	—	—	—
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	—	—	—	—
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	—	—	—	—
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	X	—	—	—

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	—	—	X	—
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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	—	—	—	—
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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	_____	_____	_____	_____
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	_____	_____	_____	_____
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B <u>or</u> the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	_____	_____
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	_____	_____

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	<u> </u>	<u> </u>	<u> </u>	<u> </u>
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	<u> </u>	<u> </u>	<u> </u>	<u> </u>

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55, -56, -57, -58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) A description of steps taken to decontaminate facility equipment.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	X	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	X	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	X	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	X	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	X	—

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	—	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	—	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	—	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

Yes No N/A Remark #

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

X _____

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	<u>X</u>	—	—	—
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<u>X</u>	—	—	—

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<u>X</u>	—	—	—
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	—	—	<u>X</u>	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	—	—	<u>X</u>	—

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-foot cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	—	—	—	—
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	—	—
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	—	—	—	—
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	—	—	—	—
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).	—	—	—	—
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	—	—	—	—
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	—	—	—	—
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	—	—	—	—
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	—	—	—	—
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	—	—	—	—
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	—	—	—	—
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	—	—	—	—

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).	—	—	—	—
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The level of freeboard in the Surface Impoundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented (Sections 265.226 and 3745-57-07).	—	—	—	—
4. Has the facility ever recorded an unplanned release of hazardous waste from the Surface Impoundment(s)? (Sections 265.15 and 3745-55-15).	—	—	—	—
5. Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes by one or both of the following methods (265.225 and 3745-57-06).	—	—	—	—
a) A complete waste analysis plus bench scale or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	—	—	—	—
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	—	—	—	—
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by the following method (Sections 265.229 and 3745-57-10).	—	—	—	—
a) The waste is treated immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	—	—	—	—
7. Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) (Sections 265.230 and 3745-57-11).	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
8. As required by Subpart F, Sections 265.90 and 3745-55-90 (Groundwater Monitoring) the facility has implemented a groundwater monitoring program capable of determining the impact of the Surface Impoundment(s) on the quality of the groundwater in the uppermost aquifer underlying the facility.	_____	_____	_____	_____
9. In lieu of a groundwater monitoring program, the operator has a written demonstration that there is a low potential for migration of hazardous waste or constituents via ground or surface waters which has been certified in writing by a qualified geologist in compliance with Sections 265.90(c) and 3745-55-90-C.	_____	_____	_____	_____
10. Upon closure of the Surface Impoundment, the operator intends to remove all wastes, residues, liners and any contaminated soil as required by Sections 265.228 and 3745-57-09 in order to exempt the Surface Impoundment from further regulation under Section 265.	_____	_____	_____	_____

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS. (SECTIONS 265.228 AND 3745-57-09).

Subpart L: Storage in Waste Piles

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal (Sections 265.251 and 3745-57-31).	_____	_____	_____	_____
2. If leachate or runoff from a Waste Pile would be a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation (Sections 265.253 and 3745-57-33).	_____	_____	_____	_____
a) The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.	___	___	___	___
c) No liquids or wastes containing free liquids are placed in the pile.	___	___	___	___
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Sections 265.252 and 3745-57-32).	___	___	___	___
4. Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met (Sections 265.256 and 3745-57-36).	___	___	___	___
a) The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive and was done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	___	___	___	___
b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.	___	___	___	___
5. Incompatible materials are never placed in the same Waste Pile or near areas containing residues of a incompatible material unless it is done in compliance with the safety requirements of Section 265.17(b) (Sections 265.257(a)(c) and 3745-57-37-A-C.	___	___	___	___
6. Piles of hazardous waste are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.257(b) and 3745-57-37-B).	___	___	___	___

RCRA INTERIM STATUS INSPECTION FORM

Subpart M: Land Treatment

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Is treated hazardous waste capable of biological or chemical degradation?	—	—	—	—
2. Are run-off and run-on diverted from the facility or collected? (Effective Date: November 19, 1981)?	—	—	—	—
3. Is waste analyzed according to 265.273?	—	—	—	—
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	—	—	—	—
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	—	—	—	—
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	—	—	—	—
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	—	—	—	—
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	—	—	—	—
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies).	—	—	—	—

Subpart N: Landfills

1. General Operating Requirements. Does the facility provide the following:

NOTE: 1a, 1b AND 1c ARE EFFECTIVE ON NOVEMBER 19, 1981.

a) Diversion of run-on away from active portions of the fill?

— — — —

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Collection of run-off from active portions of the fill?	_____	_____	_____	_____
c) Is collected run off treated?	_____	_____	_____	_____
d) Control of wind dispersal of hazardous waste?	_____	_____	_____	_____
2. Surveying and Recordkeeping. Does the operating record include:				
a) A map showing the exact location and dimensions of each cell?	_____	_____	_____	_____
b) The contents of each cell and the location of each hazardous waste type within each cell?	_____	_____	_____	_____
3. Closure and Post-Closure				
a) Is the Closure Plan available for inspection by May 19, 1981?	_____	_____	_____	_____
b) Has this plan been submitted to the Regional Administrator?	_____	_____	_____	_____
c) Has Closure begun?	_____	_____	_____	_____
d) Is Closure cost estimate available by May 19, 1981?	_____	_____	_____	_____
4. Special requirements for ignitable or reactive waste				
a) Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	_____	_____	_____	_____

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE SEE TREATMENT REQUIREMENTS . . IF NOT, THE PROVISIONS OF 40 CFR 265.17(b) APPLY.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5) Special Requirements for Incompatible Wastes.				
a) Does the owner or operator dispose of incompatible wastes in separate cells? If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. Special requirements for liquid waste (effective November 19, 1981)				
a) Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
b) Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
c) Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
d) Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
7. Special requirements for Containers (effective November 19, 1981)				
a) Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____

Subparts O and P: Incineration and Thermal Treatment

1. Determination of Steady State

- a) Type of unit (i.e., type of incinerator or thermal treatment): _____
- _____
- b) Components and steady state condition:

NOTE: INDICATE WHETHER OR NOT THIS COMPONENT WAS AT STEADY STATE PRIOR TO ADDING WASTE.

<u>Component</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

2. Waste Analysis

NOTE: THE FOLLOWING ARE MINIMUM REQUIREMENTS, FOR WASTES NOT PREVIOUSLY BURNED/TREATED:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Required analyses; has an analysis been performed for the heating value?	_____	_____	_____	_____
b) Halogen content?	_____	_____	_____	_____
c) Sulfur content?	_____	_____	_____	_____
d) Has documented or written data been substituted for analysis of either:				
1. Lead?	_____	_____	_____	_____
2. Mercury?	_____	_____	_____	_____
e) List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)				

	<u>Remark #</u>
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____
6. _____	_____
7. _____	_____

RCRA INTERIM STATUS INSPECTION FORM

3. Monitoring and Inspections

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Are combustion/emission control instruments monitored at least every 15 minutes?	—	—	—	—
b) Is steady state maintained or corrections attempted?	—	—	—	—
c) Is tack plume observed at least hourly for normal color and opacity?	—	—	—	—
d) Did any stack observations made by owner or operator show a plume different than normal?	—	—	—	—
e) If yes to "d" above, were corrections made to return emissions to normal appearance?	—	—	—	—

NOTE: SPECIFY IN REMARKS FOR WHAT PERIOD OF TIME THIS WAS CHECKED.

f) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	—	—	—	—
g) Are emergency shutdown controls and system alarms checked daily for proper operation?	—	—	—	—

4. Open Burning

NOTE: ONLY COMPLETE THIS PART IF THE FACILITY OPEN BURNS HAZARDOUS WASTE.

a) Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	—	<u>X</u>	—	<u>SODIUM/CALCIUM RESIDUE</u>
b) If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	—	—	<u>X</u>	—

RCRA INTERIM STATUS INSPECTION FORM

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft.
101 to 1,000.....	380 m	1,250 ft.
1,001 to 10,000.....	530 m	1,730 ft.
10,001 to 30,000.....	690 m	2,260 ft.

Subpart Q: Chemical, Physical and Biological Treatment

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	___	___	___	___
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	___
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	___
4. Are inspection procedures followed according to 265.403?	___	___	___	___
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	___
6. Are incompatible waste treated? (If yes, 265.17(b) applies.)	___	___	___	___

NOTE: EPA HAS TEMPORARILY SUSPENDED THE APPLICABILITY OF THE REQUIREMENTS OF THE HAZARDOUS WASTE REGULATIONS IN 40 CFR PARTS 122, 264 AND 265 TO OWNERS AND OPERATORS OF (1) WASTEWATER TREATMENT TANKS THAT RECEIVE, STORE, AND TREAT WASTEWATERS THAT ARE HAZARDOUS WASTE OR THAT GENERATE, STORE OR TREAT A WASTEWATER TREATMENT SLUDGE WHICH IS A HAZARDOUS WASTE WHERE SUCH WASTEWATERS ARE SUBJECT TO REGULATION UNDER SECTIONS 402 OR 307(b) OF THE CLEAN WATER ACT (33 U.S.C. 1251 ET SEQ.) AND (2) NEUTRALIZATION TANKS, TRANSPORT VEHICLES, VESSELS, OR CONTAINERS WHICH NEUTRALIZE WASTES WHICH ARE HAZARDOUS ONLY BECAUSE THEY EXHIBIT THE CORROSIVITY CHARACTERISTIC UNDER 40 CFR 261.22 OR ARE LISTED AS HAZARDOUS WASTES IN SUBPART D OF 40 CFR PART 261 ONLY FOR THIS REASON.

STATE IDENTIFICATION NUMBER

87-HNL 0584

EPA IDENTIFICATION NUMBER

OH0000810242

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: RMI Sodium
- (B) Street: State Rd. & E. 6th Street
- (C) City: Ashtabula (D) State: Ohio (E) Zip Code: 44004
- (F) Phone: — (G) County: Ashtabula
- (H) Operator: SAME AS ABOVE
- (I) Street: —
- (J) City: — (K) State: — (L) Zip Code: —
- (M) Phone: — (N) County: —
- (O) Owner: RMI COMPANY
- (P) Street: 1000 WARREN AVENUE
- (Q) City: Niles (R) State: Ohio (S) Zip Code: 44446
- (T) Phone: (216) 652-9951 (U) County: Trumbull
- (V) Date of Inspection: 9/23/81 (W) Time of Inspection (From) 9:30 (To) 12:00
- (X) Weather Conditions: Cool, Partially Cloudy

(Y) Person(s) Interviewed

Title

Telephone

L. S. Hanek

Plant Manager

G. W. Hakko

Joe T. Holman

Staff Environmental (216) 652-9951

Engineer

Agency/Title

Telephone

(Z) Inspection Participants

Melinda Merryfield-Becker

OEPA/Solid Waste Scientist (216) 425-9171

Helen Takacs

OEPA/Environmental Scientist (216) 425-9171

(AA) Preparer Information

Name

Agency/Title

Telephone

Melinda Merryfield-Becker

OEPA/Solid Waste Scientist (216) 425-9171

II.. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- ☒ A. Storage and/or ~~Treatment~~
Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L)

☐ B. Land Treatment (M)

☐ C. Landfills (N)

☒ D. Incineration and/or Thermal Treatment
(O and P)

☐ E. Chemical, Physical, and Biological
Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	III*	Remark
A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	—	N/A
2. Facility expansion?	—	—	—	N/A
B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	—	—	—	Sodium N/A - It is Known
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	—	—	to be reactive. No. Need for Analysis, Need analysis for sludge.
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	—	
C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	
2. Artificial or natural barrier around facility?	✓	—	—	
3. Controlled entry?	✓	—	—	
4. Danger sign(s) at entrance?	✓	—	—	
Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	
2. Records of operator error?	✓	—	—	
3. Records of discharges?	✓	—	—	